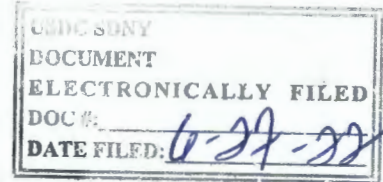


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



IN RE DIDI GLOBAL INC. SECURITIES
LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates To: All Actions

**STIPULATION AND ~~PROPOSED~~ ORDER REGARDING BRIEFING SCHEDULE
FOR DEFENDANTS' MOTIONS TO DISMISS THE CONSOLIDATED
SECOND AMENDED COMPLAINT**

WHEREAS, on May 11, 2022, this Court so-ordered a briefing schedule (ECF No. 111) (the "Order"), providing that Defendant DiDi Global Inc. and the Underwriter Defendants¹ shall file their motions to dismiss the Consolidated Second Amended Complaint (the "CSAC") by June 3, 2022; Plaintiffs shall file oppositions to the motions to dismiss by July 7, 2022; and Defendants shall file replies in further support of the motions to dismiss by August 5, 2022;

WHEREAS, on June 3, 2022, Defendant DiDi Global Inc. and the Underwriter Defendants (collectively, the "Existing Defendants") filed their motions to dismiss the CSAC pursuant to the Order;

WHEREAS, Counsel for Defendants recently informed Plaintiffs that Defendants Will Wei Cheng, Jean Qing Liu, Jingshi Zhu, Alan Yue Zhou, Zhiyi Chen, Martin Chi Ping Lau, and Daniel Yong Zhang (collectively, the "Individual Defendants") have all been served with the initial complaint filed in this Action, *Espinal v. DiDi Global Inc, et al.*;

¹ The Underwriter Defendants are Goldman Sachs (Asia) L.L.C., Morgan Stanley & Co. LLC, J.P. Morgan Securities LLC, BofA Securities Inc., Barclays Capital Inc., China Renaissance Securities (US) Inc., Citigroup Global Markets Inc., HSBC Securities (USA) Inc., UBS Securities LLC, and Mizuho Securities USA LLC.

WHEREAS, the Individuals Defendants do not concede that such purported service was effective;

WHEREAS, the Individual Defendants intend to file motions to dismiss the CSAC;

WHEREAS, the parties have met and conferred and, in the interest of judicial economy and efficiency, have agreed to (i) adjust the current motion to dismiss briefing schedule to consolidate all Defendants' motions to dismiss into a single briefing schedule; and (ii) allow Plaintiffs to file omnibus briefs (*i.e.*, consolidating arguments into one or two briefs as opposed to three or more briefs in opposition to the two Existing Defendants' motions to dismiss and anticipated Individual Defendants' motions to dismiss) in opposition to all Defendants' motions to dismiss.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval:

1. The Individual Defendants shall file their motions to dismiss by July 22, 2022;
2. By August 1, 2022, after reviewing the Individual Defendants' motions to dismiss, the parties will agree upon and jointly file a stipulation concerning omnibus briefing and a request for the enlargement of pages for consolidated opposition and reply papers with respect to all Defendants' motions dismiss.
3. Plaintiffs shall file opposition papers to all Defendants' motions to dismiss by August 22, 2022; and
4. All Defendants shall file replies in further support of the motions to dismiss by October 3, 2022.

Respectfully submitted,

Dated: June 24, 2022

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Counsel for Defendant Zhiyi Chen

SO ORDERED.

DATED: 6/27/22



Hon. Lewis A. Kaplan, U.S. District Judge

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this 24th day of June 2022, this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing and paper copies will be sent to any non-registered participants.

/s/ Laurence Rosen